

## Affidavit of Vicki Aznaran

29 Jun 93

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### SUPPLEMENTAL DECLARATION OF VICKI AZNARAN

I, Vicki Aznaran, declare:

1. I joined the Church of Scientology of California ("Scientology") in 1972, and was a member until I left in April 1987. From 1984 until 1987, I was Inspector General of the Religious Technology Center, an affiliated Scientology organization. At that time, this was one of the highest worldwide offices in Scientology. One of my offices was located at 4751 Fountain Avenue, Los Angeles.
2. By virtue of my high position, I was "in the loop" to receive communications about some of Scientology's most secret operations. The facts set forth in this declaration are based on my personal knowledge, which came from many sources, including numerous discussions and meetings with top Scientology "intelligence officials" and other Scientologists and reading documents which passed across my desk or came to my computer.
3. During the 1984-87 period, Scientology operated a number of "dirty tricks" operations out of the office of Special Affairs (OSA), including one called MFTC (for "Mission Find The Crimes") and the "WOLLY" unit (which targeted Lawrence Wollersheim, his attorneys, and his case). The orders for these operations would go directly from OSA to private investigators, although Scientology deceitfully tries to cloak such operations under "attorney-client privilege".
4. MFTC and the WOLLY unit each had about 8-10 staff, and engaged in whatever dirty tricks were necessary to attack people and entities which were considered to be "enemies" of Scientology. The dirty tricks they used included destruction of

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evidence, theft of documents, illegal surveillance or bugging, blackmail, bribery, physical assault and other intimidation, securing perjured testimony. MFTC's mission was to find or manufacture crimes for "enemies" of Scientology.

5. Before and during the trial in Wollersheim v Church of Scientology of California, MFTC and WOLLY ran a number of operations directed against Wollersheim, his counsel, and the Court. One of these operations was an attempt to put pressure on Bill Swearinger, the son of the trial judge in the Wollersheim case, based on his alleged homosexuality. The idea was to dig up, or manufacture (perhaps by setting the son up in a compromising sexual position with a minor boy), dirt on the son which could be used to pressure the Judge to rule favorably for Scientology, or else to get the Judge disqualified.
6. Attached as Exhibit A is a true copy of an internal Scientology memorandum, dated 6/21/86, which discusses this "Swearinger Investigation". I received a hard copy of this document at about that time, and I believe I also received a copy of this document on my computer. The Linda referred to on the first page is Linda Hamil, who at the time ran the MFTC. The Marty referred to on the first page is Marty Rathbun, a top Scientology "intelligence" official, who ran this operation.
7. Scientology's "ambush interview", discussed in Exhibit A, makes the Mike Wallace/60 Minutes interview called by the same name look tame. The "ambush interview" generally involves doing whatever it takes -- threats, physical force, bribery, or whatever -- to get an unprepared and unsuspecting target to say what is wanted.

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8. I understand that Lynn Farny has submitted a declaration stating that Scientology complied with Judge Swearinger's order in the Wollersheim case to produce Wollersheim's pre-clear files. This is false. As I stated in my Fishman declaration, I personally culled and destroyed (shredded) from these files evidence which would help Wollersheim and hurt Scientology in the case. I was personally ordered to do so by David Miscavage, the head of Scientology, and Marty Rathbun. The culling and destruction took place at the Fountain Avenue building in Los Angeles. I was assisted in the document destruction by then Scientologist Jessie Prince. Lynn Farny was

a low level Scientology official, and was not at the meetings where this was discussed. However, Lynn Farny is not telling the truth, because as a Scientology staff member he knows it is Scientology policy never to turn over information in litigation without first culling out (deleting and destroying) material that will harm Scientology. It is also, however, Scientology policy to lie to cover up such misdeeds.

9. Attached as Exhibit "B" to this declaration is a true copy of a document called "TR L", which is a Scientology training drill to teach Scientologists to lie convincingly.

10. I understand Scientology is trying to vacate Wollersheim's judgment on grounds that Judge Swearinger was biased against Scientology and his bias infected the jury. This is a typical Scientology tactic which it frequently uses in trials as insurance when Scientology loses an important case. Scientology will do things to set up a mistrial, such as calling jurors in the middle of the night and hanging up, threatening them, etc. Then Scientology claims that it has been the victim of the opposition's dirty tricks and the jury has become biased against Scientology.

11. Scientology also ran operations against Wollersheim's counsel, Charles O'Reilly, and his law firm. This included bugging O'Reilly's house, placing an agent in the clerical staff in O'Reilly's law firm, and attempting to set him and his bodyguards up with girls. The purpose was to discover attorney-client strategy and secrets and get or manufacture information which could compromise O'Reilly.

12. Attached as Exhibit "C" is a true copy of portions of the transcript of my deposition on August 2 and 3, 1989, in RTS v. Scott and RTC v. Wollersheim, OSDC-CDCal, CV 85-711 and 85-7197 JMI (Bx).

I declare, under penalty of perjury under the laws of the State of California, that the foregoing is true and correct. Executed this 29th day of June, 1993

[signed]

Vicki Aznaran

